

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
ST. LOUIS DIVISION**

MARK BOSWELL and
DAVID LUTTON, individually, and on
behalf of all others similarly situated,

Plaintiffs,

v.

PANERA BREAD COMPANY and
PANERA, LLC,

Defendant.

Case No. 4:14-CV-01833-AGF

MOTION FOR JOINTLY PROPOSED PROTECTIVE ORDER

Pursuant to Fed. R. Civ. P. 26(c), the parties move the Court for a Protective Order prohibiting and restricting the disclosure of confidential and proprietary information.

The Plaintiffs allege claims of breach of contract and fraud against Defendants, and seek monetary damages from Defendants on behalf of themselves and a purported class of current and former Joint Venture General Managers. Defendants deny Plaintiffs' claims, deny that a class should be certified, and deny that Plaintiffs are entitled to any monetary damages. Accordingly, the Plaintiffs have requested, and the Defendants have identified, in their initial disclosures, documents and information regarding the Defendants' intellectual property, business operations, and financial condition that the Defendants consider to be confidential, proprietary or trade secrets. The Defendants are expected to seek documents and information regarding the Plaintiff's personal financial information. The Defendants consider its confidential information, proprietary information, trade secrets, and employment records to be confidential, and the Plaintiffs consider their personal financial information to be confidential. Based on the foregoing, good cause exists for entry of this Protective Order.

The parties have met and conferred regarding the scope and terms of the attached Protective Order. The parties reached an agreement and jointly propose the attached Protective Order to this Court.

WHEREFORE, the parties request this Court enter their Stipulated Protective Order, and for such other relief as this Court deems appropriate.

Respectfully Submitted,

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